

Donaldson & Chilliast, LLP
1825 Park Avenue, Suite 1102
New York, NY 10035
212-722-4900
212-722-4966
xdonaldson@aol.com

January 25, 2021

BY ECF and Email

The Honorable Richard J. Sullivan
United States Court of Appeals
Second Circuit
40 Foley Square
New York, NY 10007

Re: *United States v. Cleon Clarke*,
16 Cr 781 (RJS)

Dear Judge Sullivan:

As the Court is aware, I represented Mr. Clarke at the District Court level through his sentencing. It has come to my attention that Mr. Clarke has filed a *pro se* motion pursuant to 18 U.S.C. §3582(c)(1)(A) and the Government has timely responded. With the Government's consent, I am requesting permission to either supplement Mr. Clarke's motion and/or file a reply to the Government's response. If permitted to do so, I can file said motions on or before February 5, 2021 hoping to have it filed by February 3, 2021. Thank you for your consideration.

Sincerely,

Xavier R. Donaldson

Xavier R. Donaldson

cc: AUSA Jessica Feinstein